

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Statement of Issues
Against:

ROBIN RENEE CASEY
1328 MAGNOLIA AVENUE
REDDING, CA 96001

Application for Licensure by Exam

Respondent

Case No. 2008-373

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order are hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in the above entitled matter.

This Decision shall become effective on **JANUARY 19, 2008.**

IT IS SO ORDERED **DECEMBER 19, 2008.**



President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 ARTHUR D. TAGGART
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8 Attorneys for Complainant

9 **BEFORE THE**
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
10 **STATE OF CALIFORNIA**

11 In the Matter of the Statement of Issues Against:

Case No. 2008-373

12 **ROBIN RENEE CASEY, AKA**
13 **ROBIN R. CASEY, AKA**
14 **ROBIN RENEE SAYER, AKA**
ROBIN RENEE CAMERON
15 1328 Magnolia Avenue
Redding, CA 96001

OAH No. 2008080929

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

Respondent.

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18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
19 above-entitled proceedings that the following matters are true:

20 PARTIES

21 1. Ruth Ann Terry, M.P.H., R.N. ("Complainant") is the Executive Officer
22 of the Board of Registered Nursing ("Board"). She brought this action solely in her official
23 capacity and is represented in this matter by Edmund G. Brown Jr., Attorney General of the State
24 of California, by Geoffrey S. Allen, Deputy Attorney General.

25 2. Respondent Robin Renee Casey, also known as Robin R. Casey, Robin
26 Renee Sayer, and Robin Renee Cameron ("Respondent") is representing herself in this
27 proceeding and has chosen not to exercise her right to be represented by counsel.

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3. On or about December 19, 2007, the Board received an Application for Licensure by Examination for a registered nurse license ("Application") from Respondent. On or about December 10, 2007, Respondent certified under penalty of perjury to the truthfulness of all statements, answers, and representations in the Application. The Board denied the Application on February 4, 2008. Respondent timely filed a request for a hearing contesting the denial of the Application.

JURISDICTION

4. Statement of Issues No. 2008-373 ("Statement of Issues") was filed before the Board, Department of Consumer Affairs, and is currently pending against Respondent. The Statement of Issues and all other statutorily required documents were properly served on Respondent on July 30, 2008. A copy of the Statement of Issues is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in the Statement of Issues. Respondent has also carefully read, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Statement of Issues; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in the Statement of Issues.

1 9. Respondent agrees to be bound by the Board's imposition of discipline as
2 set forth in the Disciplinary Order below.

3 CONTINGENCY

4 10. This stipulation shall be subject to approval by the Board. Respondent
5 understands and agrees that counsel for Complainant and the staff of the Board may
6 communicate directly with the Board regarding this stipulation and settlement, without notice to
7 or participation by Respondent. By signing the stipulation, Respondent understands and agrees
8 that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the
9 Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and
10 Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for
11 this paragraph, it shall be inadmissible in any legal action between the parties, and the Board
12 shall not be disqualified from further action by having considered this matter.

13 11. The parties understand and agree that facsimile copies of this Stipulated
14 Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same
15 force and effect as the originals.

16 12. In consideration of the foregoing admissions and stipulations, the parties
17 agree that the Board may, without further notice or formal proceeding, issue and enter the
18 following Disciplinary Order:

19 DISCIPLINARY ORDER

20 IT IS HEREBY ORDERED that the application of Respondent Robin Casey for
21 licensure is hereby granted. Upon successful completion of the licensure examination and all
22 other licensing requirements, a license shall be issued to Respondent. Said license shall
23 immediately be revoked, the order of revocation stayed and Respondent placed on probation for
24 a period of three (3) years on the following conditions:

25 **Severability Clause.** Each condition of probation contained herein is a separate
26 and distinct condition. If any condition of this Order, or any application thereof, is declared
27 unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other
28 applications thereof, shall not be affected. Each condition of this Order shall separately be valid

1 and enforceable to the fullest extent permitted by law.

2 1. **Obey All Laws.** Respondent shall obey all federal, state and local laws.
3 A full and detailed account of any and all violations of law shall be reported by Respondent to
4 the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of
5 compliance with this condition, Respondent shall submit completed fingerprint forms and
6 fingerprint fees within 45 days of the effective date of the decision, unless previously submitted
7 as part of the licensure application process.

8 **Criminal Court Orders:** If Respondent is under criminal court orders, including
9 probation or parole, and the order is violated, this shall be deemed a violation of these probation
10 conditions, and may result in the filing of an accusation and/or petition to revoke probation.

11 2. **Comply with the Board's Probation Program.** Respondent shall fully
12 comply with the conditions of the Probation Program established by the Board and cooperate
13 with representatives of the Board in its monitoring and investigation of the Respondent's
14 compliance with the Board's Probation Program. Respondent shall inform the Board in writing
15 within no more than 15 days of any address change and shall at all times maintain an active,
16 current license status with the Board, including during any period of suspension.

17 Upon successful completion of probation, Respondent's license shall be fully
18 restored.

19 3. **Report in Person.** Respondent, during the period of probation, shall
20 appear in person at interviews/meetings as directed by the Board or its designated
21 representatives.

22 4. **Residency, Practice, or Licensure Outside of State.** Periods of
23 residency or practice as a registered nurse outside of California shall not apply toward a
24 reduction of this probation time period. Respondent's probation is tolled, if and when she
25 resides outside of California. Respondent must provide written notice to the Board within 15
26 days of any change of residency or practice outside the state, and within 30 days prior to re-
27 establishing residency or returning to practice in this state.

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1 Respondent shall provide a list of all states and territories where she has ever been
2 licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further
3 provide information regarding the status of each license and any changes in such license status
4 during the term of probation. Respondent shall inform the Board if she applies for or obtains a
5 new nursing license during the term of probation.

6 5. **Submit Written Reports.** Respondent, during the period of probation,
7 shall submit or cause to be submitted such written reports/declarations and verification of actions
8 under penalty of perjury, as required by the Board. These reports/declarations shall contain
9 statements relative to Respondent's compliance with all the conditions of the Board's Probation
10 Program. Respondent shall immediately execute all release of information forms as may be
11 required by the Board or its representatives.

12 Respondent shall provide a copy of this Decision to the nursing regulatory agency
13 in every state and territory in which she has a registered nurse license.

14 6. **Function as a Registered Nurse.** Respondent, during the period of
15 probation, shall engage in the practice of registered nursing in California for a minimum of 24
16 hours per week for 6 consecutive months or as determined by the Board.

17 For purposes of compliance with the section, "engage in the practice of registered
18 nursing" may include, when approved by the Board, volunteer work as a registered nurse, or
19 work in any non-direct patient care position that requires licensure as a registered nurse.

20 The Board may require that advanced practice nurses engage in advanced practice
21 nursing for a minimum of 24 hours per week for 6 consecutive months or as determined by the
22 Board.

23 If Respondent has not complied with this condition during the probationary term,
24 and Respondent has presented sufficient documentation of her good faith efforts to comply with
25 this condition, and if no other conditions have been violated, the Board, in its discretion, may
26 grant an extension of Respondent's probation period up to one year without further hearing in
27 order to comply with this condition. During the one year extension, all original conditions of
28 probation shall apply.

1 7. **Employment Approval and Reporting Requirements.** Respondent
2 shall obtain prior approval from the Board before commencing or continuing any employment,
3 paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all
4 performance evaluations and other employment related reports as a registered nurse upon request
5 of the Board.

6 Respondent shall provide a copy of this Decision to her employer and immediate
7 supervisors prior to commencement of any nursing or other health care related employment.

8 In addition to the above, Respondent shall notify the Board in writing within
9 seventy-two (72) hours after she obtains any nursing or other health care related employment.
10 Respondent shall notify the Board in writing within seventy-two (72) hours after she is
11 terminated or separated, regardless of cause, from any nursing, or other health care related
12 employment with a full explanation of the circumstances surrounding the termination or
13 separation.

14 8. **Supervision.** Respondent shall obtain prior approval from the Board
15 regarding Respondent's level of supervision and/or collaboration before commencing or
16 continuing any employment as a registered nurse, or education and training that includes patient
17 care.

18 Respondent shall practice only under the direct supervision of a registered nurse
19 in good standing (no current discipline) with the Board of Registered Nursing, unless alternative
20 methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician)
21 are approved.

22 Respondent's level of supervision and/or collaboration may include, but is not
23 limited to the following:

24 (a) Maximum - The individual providing supervision and/or collaboration is
25 present in the patient care area or in any other work setting at all times.

26 (b) Moderate - The individual providing supervision and/or collaboration is in
27 the patient care unit or in any other work setting at least half the hours Respondent works.

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1 (c) Minimum - The individual providing supervision and/or collaboration has
2 person-to-person communication with Respondent at least twice during each shift worked.

3 (d) Home Health Care - If Respondent is approved to work in the home health
4 care setting, the individual providing supervision and/or collaboration shall have person-to-
5 person communication with Respondent as required by the Board each work day. Respondent
6 shall maintain telephone or other telecommunication contact with the individual providing
7 supervision and/or collaboration as required by the Board during each work day. The individual
8 providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-
9 site visits to patients' homes visited by Respondent with or without Respondent present.

10 9. **Employment Limitations.** Respondent shall not work for a nurse's
11 registry, in any private duty position as a registered nurse, a temporary nurse placement agency,
12 a traveling nurse, or for an in-house nursing pool.

13 Respondent shall not work for a licensed home health agency as a visiting nurse
14 unless the registered nursing supervision and other protections for home visits have been
15 approved by the Board. Respondent shall not work in any other registered nursing occupation
16 where home visits are required.

17 Respondent shall not work in any health care setting as a supervisor of registered
18 nurses. The Board may additionally restrict Respondent from supervising licensed vocational
19 nurses and/or unlicensed assistive personnel on a case-by-case basis.

20 Respondent shall not work as a faculty member in an approved school of nursing
21 or as an instructor in a Board approved continuing education program.

22 Respondent shall work only on a regularly assigned, identified and predetermined
23 worksite(s) and shall not work in a float capacity.

24 If Respondent is working or intends to work in excess of 40 hours per week, the
25 Board may request documentation to determine whether there should be restrictions on the hours
26 of work.

27 10. **Complete a Nursing Course(s).** Respondent, at her own expense, shall
28 enroll and successfully complete a course(s) relevant to the practice of registered nursing no later

1 than six months prior to the end of her probationary term.

2 Respondent shall obtain prior approval from the Board before enrolling in the
3 course(s). Respondent shall submit to the Board the original transcripts or certificates of
4 completion for the above required course(s). The Board shall return the original documents to
5 Respondent after photocopying them for its records.

6 11. **Violation of Probation.** If Respondent violates the conditions of her
7 probation, the Board after giving Respondent notice and an opportunity to be heard, may set
8 aside the stay order and impose the stayed discipline (revocation/suspension) of Respondent's
9 license.

10 If during the period of probation, an accusation or petition to revoke probation has
11 been filed against Respondent's license or the Attorney General's Office has been requested to
12 prepare an accusation or petition to revoke probation against Respondent's license, the
13 probationary period shall automatically be extended and shall not expire until the accusation or
14 petition has been acted upon by the Board.

15 12. **License Surrender.** During Respondent's term of probation, if she ceases
16 practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of
17 probation, Respondent may surrender her license to the Board. The Board reserves the right to
18 evaluate Respondent's request and to exercise its discretion whether to grant the request, or to
19 take any other action deemed appropriate and reasonable under the circumstances, without
20 further hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent
21 will no longer be subject to the conditions of probation.

22 Surrender of Respondent's license shall be considered a disciplinary action and
23 shall become a part of Respondent's license history with the Board. A registered nurse whose
24 license has been surrendered may petition the Board for reinstatement no sooner than the
25 following minimum periods from the effective date of the disciplinary decision:

26 (1) Two years for reinstatement of a license that was surrendered for any
27 reason other than a mental or physical illness; or

28 (2) One year for a license surrendered for a mental or physical illness.

1 13. **Physical Examination.** Within 45 days of the effective date of this
2 Decision, Respondent, at her expense, shall have a licensed physician, nurse practitioner, or
3 physician assistant, who is approved by the Board before the assessment is performed, submit an
4 assessment of the Respondent's physical condition and capability to perform the duties of a
5 registered nurse. Such an assessment shall be submitted in a format acceptable to the Board. If
6 medically determined, a recommended treatment program will be instituted and followed by the
7 Respondent with the physician, nurse practitioner, or physician assistant providing written
8 reports to the Board on forms provided by the Board.

9 If Respondent is determined to be unable to practice safely as a registered nurse,
10 the licensed physician, nurse practitioner, or physician assistant making this determination shall
11 immediately notify the Board and Respondent by telephone, and the Board shall request that the
12 Attorney General's office prepare an accusation or petition to revoke probation. Respondent
13 shall immediately cease practice and shall not resume practice until notified by the Board.
14 During this period of suspension, Respondent shall not engage in any practice for which a
15 license issued by the Board is required until the Board has notified Respondent that a medical
16 determination permits Respondent to resume practice. This period of suspension will not apply
17 to the reduction of this probationary time period.

18 If Respondent fails to have the above assessment submitted to the Board within
19 the 45-day requirement, Respondent shall immediately cease practice and shall not resume
20 practice until notified by the Board. This period of suspension will not apply to the reduction of
21 this probationary time period. The Board may waive or postpone this suspension only if
22 significant, documented evidence of mitigation is provided. Such evidence must establish good
23 faith efforts by Respondent to obtain the assessment, and a specific date for compliance must be
24 provided. Only one such waiver or extension may be permitted.

25 14. **Participate in Treatment/Rehabilitation Program for Chemical**
26 **Dependence.** Respondent, at her expense, shall successfully complete during the probationary
27 period or shall have successfully completed prior to commencement of probation a Board-
28 approved treatment/rehabilitation program of at least six months duration. As required, reports

1 shall be submitted by the program on forms provided by the Board. If Respondent has not
2 completed a Board-approved treatment/rehabilitation program prior to commencement of
3 probation, Respondent, within 45 days from the effective date of the decision, shall be enrolled
4 in a program. If a program is not successfully completed within the first nine months of
5 probation, the Board shall consider Respondent in violation of probation.

6 Based on Board recommendation, each week Respondent shall be required to
7 attend at least one, but no more than five 12-step recovery meetings or equivalent (e.g.,
8 Narcotics Anonymous, Alcoholics Anonymous, etc.) and a nurse support group as approved and
9 directed by the Board. If a nurse support group is not available, an additional 12-step meeting or
10 equivalent shall be added. Respondent shall submit dated and signed documentation confirming
11 such attendance to the Board during the entire period of probation. Respondent shall continue
12 with the recovery plan recommended by the treatment/rehabilitation program or a licensed
13 mental health examiner and/or other ongoing recovery groups.

14 **15. Abstain from Use of Psychotropic (Mood-Altering) Drugs.**

15 Respondent shall completely abstain from the possession, injection or consumption by any route
16 of all controlled substances and all psychotropic (mood altering) drugs, including alcohol, except
17 when the same are ordered by a health care professional legally authorized to do so as part of
18 documented medical treatment. Respondent shall have sent to the Board, in writing and within
19 fourteen (14) days, by the prescribing health professional, a report identifying the medication,
20 dosage, the date the medication was prescribed, the Respondent's prognosis, the date the
21 medication will no longer be required, and the effect on the recovery plan, if appropriate.

22 Respondent shall identify for the Board a single physician, nurse practitioner or
23 physician assistant who shall be aware of Respondent's history of substance abuse and will
24 coordinate and monitor any prescriptions for Respondent for dangerous drugs, controlled
25 substances or mood-altering drugs. The coordinating physician, nurse practitioner, or physician
26 assistant shall report to the Board on a quarterly basis Respondent's compliance with this
27 condition. If any substances considered addictive have been prescribed, the report shall identify
28 a program for the time limited use of any such substances.

1 The Board may require the single coordinating physician, nurse practitioner, or
2 physician assistant to be a specialist in addictive medicine, or to consult with a specialist in
3 addictive medicine.

4 16. **Submit to Tests and Samples.** Respondent, at her expense, shall
5 participate in a random, biological fluid testing or a drug screening program which the Board
6 approves. The length of time and frequency will be subject to approval by the Board.
7 Respondent is responsible for keeping the Board informed of Respondent's current telephone
8 number at all times. Respondent shall also ensure that messages may be left at the telephone
9 number when she is not available and ensure that reports are submitted directly by the testing
10 agency to the Board, as directed. Any confirmed positive finding shall be reported immediately
11 to the Board by the program and Respondent shall be considered in violation of probation.

12 In addition, Respondent, at any time during the period of probation, shall fully
13 cooperate with the Board or any of its representatives, and shall, when requested, submit to such
14 tests and samples as the Board or its representatives may require for the detection of alcohol,
15 narcotics, hypnotics, dangerous drugs, or other controlled substances.

16 If Respondent has a positive drug screen for any substance not legally authorized
17 and not reported to the coordinating physician, nurse practitioner, or physician assistant, and the
18 Board files a petition to revoke probation or an accusation, the Board may suspend Respondent
19 from practice pending the final decision on the petition to revoke probation or the accusation.
20 This period of suspension will not apply to the reduction of this probationary time period.

21 If Respondent fails to participate in a random, biological fluid testing or drug
22 screening program within the specified time frame, Respondent shall immediately cease practice
23 and shall not resume practice until notified by the Board. After taking into account documented
24 evidence of mitigation, if the Board files a petition to revoke probation or an accusation, the
25 Board may suspend Respondent from practice pending the final decision on the petition to
26 revoke probation or the accusation. This period of suspension will not apply to the reduction of
27 this probationary time period.

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1 17. **Mental Health Examination.** Respondent shall, within 45 days of the
2 effective date of this Decision, have a mental health examination including psychological testing
3 as appropriate to determine her capability to perform the duties of a registered nurse. The
4 examination will be performed by a psychiatrist, psychologist or other licensed mental health
5 practitioner approved by the Board. The examining mental health practitioner will submit a
6 written report of that assessment and recommendations to the Board. All costs are the
7 responsibility of Respondent. Recommendations for treatment, therapy or counseling made as a
8 result of the mental health examination will be instituted and followed by Respondent.

9 If Respondent is determined to be unable to practice safely as a registered nurse,
10 the licensed mental health care practitioner making this determination shall immediately notify
11 the Board and Respondent by telephone, and the Board shall request that the Attorney General's
12 office prepare an accusation or petition to revoke probation. Respondent shall immediately
13 cease practice and may not resume practice until notified by the Board. During this period of
14 suspension, Respondent shall not engage in any practice for which a license issued by the Board
15 is required, until the Board has notified Respondent that a mental health determination permits
16 Respondent to resume practice. This period of suspension will not apply to the reduction of this
17 probationary time period.

18 If Respondent fails to have the above assessment submitted to the Board within
19 the 45-day requirement, Respondent shall immediately cease practice and shall not resume
20 practice until notified by the Board. This period of suspension will not apply to the reduction of
21 this probationary time period. The Board may waive or postpone this suspension only if
22 significant, documented evidence of mitigation is provided. Such evidence must establish good
23 faith efforts by Respondent to obtain the assessment, and a specific date for compliance must be
24 provided. Only one such waiver or extension may be permitted.

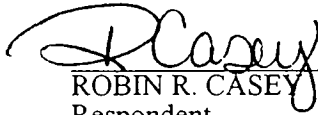
25 18. **Therapy or Counseling Program.** Respondent, at her expense, shall
26 participate in an on-going counseling program until such time as the Board releases her from this
27 requirement and only upon the recommendation of the counselor. Written progress reports from
28 the counselor will be required at various intervals.

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ACCEPTANCE

I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the stipulation and the effect it will have on my RN. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: 10/10/08


ROBIN R. CASEY
Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

DATED: 10/31/08

EDMUND G. BROWN JR., Attorney General
of the State of California

ARTHUR D. TAGGART
Supervising Deputy Attorney General

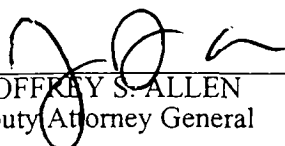

GEOFFREY S. ALLEN
Deputy Attorney General
Attorneys for Complainant

Exhibit A

Statement of Issues No. 2008-373

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 ARTHUR D. TAGGART
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7 Attorneys for Complainant

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
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14 **ROBIN R. CASEY, AKA**
15 **ROBIN RENEE SAYER, AKA**
16 **ROBIN RENEE CAMERON**
1328 Magnolia Avenue
Redding, CA 96001

STATEMENT OF ISSUES

Respondent.

17 Complainant alleges:

18 **PARTIES**

19 1. Ruth Ann Terry, M.P.H., R.N. ("Complainant") brings this Statement of
20 Issues solely in her official capacity as the Executive Officer of the Board of Registered Nursing
21 ("Board"), Department of Consumer Affairs.

22 2. On or about December 19, 2007, the Board received an Application for
23 Licensure by Examination for a registered nurse license ("application") from Robin Renee Casey,
24 also known as Robin R. Casey, Robin Renee Sayer, and Robin Renee Cameron ("Respondent").
25 On or about December 10, 2007, Respondent certified under penalty of perjury to the truthfulness
26 of all statements, answers, and representations in the application. The Board denied the
27 application on February 4, 2008.

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STATUTORY PROVISIONS

3. Business and Professions Code ("Code") section 2761 states, in pertinent part:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

(f) Conviction of a felony or of any offense substantially related to the qualifications, functions, and duties of a registered nurse, in which event the record of the conviction shall be conclusive evidence thereof.

4. Code section 480 states, in pertinent part:

(a) A board may deny a license regulated by this code on the grounds that the applicant has one of the following:

(1) Been convicted of a crime. A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere. . . .

(3) Done any act which if done by a licensee of the business or profession in question, would be grounds for suspension or revocation of license.

5. Code section 2762 states:

In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:

(b) Use any controlled substance as defined in Division 10 (commencing with Section 11000) of the Health and Safety Code, or any dangerous drug or dangerous device as defined in Section 4022, or alcoholic beverages, to an extent or in a manner dangerous or injurious to himself or herself, any other person, or the public or to the extent that such use impairs his or her ability to conduct with safety to the public the practice authorized by his or her license.

(c) Be convicted of a criminal offense involving the prescription, consumption, or self-administration of any of the substances described in subdivisions (a) and (b) of this section, or the possession of, or falsification of a record pertaining to, the substances described in subdivision (a) of this section, in which event the record of the conviction is conclusive evidence thereof.

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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Denying the application of Robin Renee Casey, also known as Robin R. Casey, Robin Renee Sayer, and Robin Renee Cameron, for a registered nurse license; and,
2. Taking such other and further action as deemed necessary and proper.

DATED: 7/1/08


RUTH ANN TERRY, M.P.H., R.N.
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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